## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

THE ALABAMA STATE CONFERENCE OF THE NAACP, et al.,

Plaintiffs,

v.

Civil Case No. 2:18-cv-02056-LSC

CITY OF PLEASANT GROVE, et al.

Defendants.

# JOINT NOTICE OF FILING OF EXECUTED SETTLEMENT AGREEMENT

Plaintiffs Alabama State Conference of the NAACP, Eric Calhoun, and Jennifer Ford (collectively, "Plaintiffs") and Defendant City of Pleasant Grove, Alabama, by and through their undersigned counsel, jointly notify the Court that they have fully executed the Settlement Agreement that was filed on July 25, 2019, as an attachment to the parties' pending Joint Motion for Approval of Settlement and Request for Entry of Consent Decree (Doc. No. 38). A copy of the executed settlement agreement is attached as Exhibit A to this Joint Notice.

Upon receipt of this Notice, Plaintiffs and Defendant respectfully request that this Court sign and enter the previously filed Consent Order (Doc. No. 38-2).

## Respectfully submitted on October 3, 2019.

## For Plaintiffs:

## /s/ Deuel Ross

Deuel Ross\*
John Z. Morris\*
NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.
40 Rector Street, 5th Floor
New York, NY 10006
Phone: (212) 965-2200
zmorris@naacpldf.org

#### /s/ Catherine Meza

Catherine Meza\*
NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.
700 14th Street NW, Suite 600
Washington, DC 20005
Phone: (202) 682-1300
cmeza@naacpldf.org

#### /s/ James U. Blacksher

James U. Blacksher
Bar No. ASB-2381-S82J
P.O. Box 636
Birmingham, AL 35201
Phone: (205) 591-7238
jblacksher@ns.sympatico.ca

## For Defendant:

## /s/ David J. Canupp

David J. Canupp
J. Bradley Emmons
LANIER FORD SHAVER &
PAYNE, P.C.
P.O. Box 2087
2102 West Clinton Avenue, Suite 102
Huntsville, AL 35804
Phone: (256) 535-1100
djc@lanierford.com

<sup>\*</sup>Pro Hac Vice

# **CERTIFICATE OF SERVICE**

I certify that on October 3, 2019, I filed the foregoing Joint Notice electronically via the Court's CM/ECF system, which will send a copy to all counsel of record.

/s/ Catherine Meza
Catherine Meza
NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.
700 14th Street NW, Suite 600
Washington, DC 20005
Phone: (202) 682-1300
cmeza@naacpldf.org